



Andrew B. Smith, Esq.

*Admitted in NJ and NY*

4 Chatham Road, Suite 1  
Summit, NJ 07901

P: 973.206.1725

F: 973.794.2589

andrew@sslawfirmllc.com

June 21, 2022

**VIA EFILING**

Magistrate Judge Anne Marie Donio  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

**Re: Estate of Edward Gandy, Jr. et al v. City of Millville et al**  
**Case No.: 1:20-CV-00641-NLH-AMD**

---

Dear Judge Donio:

This firm represents Plaintiffs the Estate of Edward Gandy, Jr. and Shane Gandy ("Plaintiffs"). Per this Court's Order, please accept this letter as Plaintiff's request for an extension of time for fact depositions until July 31, 2022. As discussed at the last case management conference, party depositions revealed individuals who may have important information relevant to this matter. Per Your Honor's directive, Plaintiff issued notices of depositions and subpoenas for those witnesses, with deposition dates of July 5, 13, 14, 19, 20, 26 and 27, with some of those dates including multiple deponents. Defense counsel is working with their clients to secure these dates, but they have not been confirmed. Given that the depositions have not been confirmed and those are most of my available days in July, Plaintiff would appreciate an extension of fact discovery to August 15, 2022 to give us a little more flexibility. Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to have a member of your staff contact me directly.

Respectfully,  
**SMITH + SCHWARTZSTEIN LLC**

/s/ Andrew Smith

By: \_\_\_\_\_  
Andrew B. Smith, Esq.

cc: Counsel of Record